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Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Mondragon v. Mike Mini Mart and Deli Corp., et al.
20-cv-682

Your Honor,

I represent the Plaintiff in this matter and I write to respectfully request that the Court permit Plaintiff to submit his default motion on or before November 16th, 2020 instead of the existing November 6th, 2020 deadline.

As I stated in Plaintiff's last letter motion, the pandemic and the lack of employment opportunities have provoked Mr. Mondragon to move to Mexico. Since that move, I had difficulty reaching Mr. Mondragon to prepare a default motion.

Happily, however, Mr. Mondragon has established himself and I have been in regular contact with him as of last week. I believe a niece is helping him work with the computer and he has access to wi-fi to talk with me after work.

I have sent him over a declaration to review and hopefully sign. I simply need a few more days to co-ordinate with him after his working hours to make sure the declaration is complete and accurate. And, also to make sure to give him enough time to access a printer.

If it pleases the Court, the undersigned would respectfully request just a little more than one additional week.

This is the Plaintiff's third request for an extension of time.

/s/Colin Mulholland, Esq.
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GRANTED. By **November 16, 2020**, Plaintiff shall file his default motion.

SO ORDERED.

Dated: November 5, 2020
New York, New York



ANALISA TORRES
United States District Judge